

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

AIR LINE PILOTS ASSOCIATION,  
INTERNATIONAL

Plaintiff,

v.

FRONTIER AIRLINES, INC.,

Defendant.

Case No. 1:18-cv-05089

Hon. Charles R. Norgle, Sr.  
Magistrate Judge M. David  
Weisman

**JOINT MOTION FOR EXTENSION OF TIME**  
**FOR DEFENDANT'S RESPONSE TO PLAINTIFF'S COMPLAINT**

The Parties, Air Line Pilots Association, International ("ALPA"), and Defendant Frontier Airlines, Inc. ("Frontier"), (collectively, the "Parties") through undersigned counsel, hereby respectfully and jointly move this Court for the entry of an Order extending the deadline for Frontier to answer, move, or otherwise respond to Plaintiff's Complaint to January 17, 2019, and in support thereof the Parties state as follows:

1. ALPA filed its Complaint on July 25, 2018. (Dkt. #1). Frontier waived service on July 25, 2018. (Dkt. #7).
2. The Parties respectfully and jointly request that this Court enter an Order extending the deadline for Frontier to answer, move, or otherwise respond to ALPA's Complaint to January 17, 2019.
3. This is the second request for an extension of time for Frontier to answer, move, or otherwise respond to ALPA's Complaint: on September 24, 2018, Frontier filed its Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint (Dkt. # 11), and the Court granted that motion on October 11, 2018. (Dkt. #13).

4. The present motion is not brought for purpose of delay. This matter arises out of a dispute with regard to the Parties' negotiations as to their collective bargaining agreement. The Parties recently reached a Framework Agreement for their new collective bargaining agreement, and now require time to convert their Framework Agreement into formal contract language and for ALPA's governing body to consider and approve that language. Therefore, once the ALPA Frontier MEC approves a tentative agreement and authorizes membership ratification, the instant lawsuit will be dismissed with prejudice. The Parties will further update the Court in their Agreed Status Report, which is due January 10, 2019.

5. In the event that the lawsuit is not dismissed and that Frontier's response to the Complaint is a motion pursuant to Rule 12 of the Federal Rules of Civil Procedure, the Parties agree that ALPA's opposition brief will be due on February 20, 2019, and that Frontier's reply brief will be due on March 20, 2019.

WHEREFORE, for the reasons discussed herein, the Parties, Air Line Pilots Association, International, and Defendant Frontier Airlines, Inc., respectfully and jointly request that this Court enter an Order extending the deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint to January 17, 2019, and for any other such relief that the Court deems just.

Dated: November 9, 2018.

Respectfully Submitted,

/s/ Rami N. Fakhouri

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on November 9, 2018, pursuant to Fed. R. Civ. P. 5 and LR 5.5, a true and correct copy of the foregoing Joint Motion for Extension of Time for Defendant's Response to Plaintiff's Complaint was filed with the Clerk of Court using the CM/ECF System, which will send notification of such filing to the attorneys of record at the email addresses on file with the court.

/s/ *Larry S. Kaplan*

Larry S. Kaplan